## **Via Electronic Filing**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: Written Ex Parte Presentation

WT Docket Nos. 08-61 & 03-187

Dear Ms. Dortch:

The Conservation Groups (consisting of the American Bird Conservancy, Defenders of Wildlife, and the National Audubon Society) hereby submit the enclosed memorandum on the standard under NEPA for evaluating the significance of bird mortality from communications towers in light of other impacts on birds.

Respectfully submitted,

/s/ Greer S. Goldman Greer S. Goldman 4231 Lenore Lane, NW Washington, DC 20008 (202) 302-5931

Counsel for the Conservation Groups

Enclosure